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6 July 2017

VIA US MAIL

Regional Freedom of Information Officer U.S. EPA Region 4 AFC Bldg 61 Forsyth Street S.W., 9th Floor Atlanta, GA 30303-8960

Re:

Rosa Ann Menafee, etc. v. John Crane Inc.

Circuit Court of Lee County, AL

CV-2016-900420

Dear Sir or Madam:

This firm represents Defendant John Crane Inc. in the above-referenced case. A copy of a subpoena which will be served upon you at the request of Plaintiff's counsel is enclosed. Under the Alabama Rules of Civil Procedure, we have a right to receive copies of documents produced to any other party in response to a subpoena. Therefore, please send me copies of any documents produced to Plaintiff's attorney in response to the subpoena. We will reimburse you with any reasonable costs incurred in connection with this request.

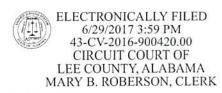
Please give us a call if you have any questions.

Sincerely,

HUIE, FERNAMBUCQ & STEWART, LLP

Frank E. Lankford, gr.

By: Frank E. Lankford, Jr. FEL/tc Enclosure



IN THE CIRCUIT COURT OF LEE COUNTY, ALABAMA

ROSA ANN MENAFEE, Individually)
AND AS PERSONAL REPRESENTATIVE)
OF THE ESTATE OF CORNELL)
MENAFEE, deceased,)
Plaintiff,)
V.) Civil Action No.:) 43-CV-2016-900420
CERTAINTEED CORPORATION; Et al.)
Defendants.	5

NOTICE OF INTENT TO SERVE SUBPOENA ON NON-PARTY

Take notice that upon the expiration of fifteen (15) days from the date of service of this notice Plaintiff, Rosa Ann Menafee will apply to the Clerk of this Court for issuance of the attached subpoena directed to Regional Freedom of Information Officer, U.S. EPA, Region 4, who is not a party and whose address is AFC Bldg, 61 Forsyth Street., S.W., 9th Flr (4PM/IF), Atlanta, GA 30303-8960, to produce the documents and things at the time and place specified in the subpoena.

/s/ Thomas J. Knight Thomas J. Knight Attorney for Plaintiffs

HUBBARD & KNIGHT 1125 Noble Street Anniston, Alabama 36201 Phone: 256-237-9586 Facsimile: 256-237-9594

Email: hubbardknight@msn.com

/s/ Steve R. Morris Steve R. Morris Attorney for Plaintiff Steve Morris Law P.O. Box 814 Wedowee, Alabama 36278 Phone: (256) 357-9222

Facsimile: 256-237-9594

Email: stevemorrislaw@yahoo.com

/s/ Ben Hand Ben Hand(HAN035) Attorney for Plaintiff

Hand & Associates 114 N 8th St Opelika, AL 36801-4334 Phone: (334) 741-4077 Facsimile: (334) 741-4074

Email: LLCben@handlawfirm.com

CERTIFICATE OF SERVICE

I hereby certify that on June 30, 2017, I electronically filed the foregoing with the clerk of court using the CM/ECF system, which will send notification of such filing to all counsel of record in this case.

/s/ Thomas J. Knight
Thomas J. Knight
Attorney for Plaintiff

IN THE CIRCUIT COURT OF LEE COUNTY, ALABAMA

ROSA ANN MENAFEE, Individually)	
AND AS PERSONAL REPRESENTATIVE)	
OF THE ESTATE OF CORNELL)	
MENAFEE, deceased,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No.:
)	43-CV-2016-900420
)	
CERTAINTEED CORPORATION; Et al.)	
)	
Defendants.)	

CIVIL SUBPOENA FOR PRODUCTION OF DOCUMENTS, ETC., UNDER RULE 45

TO: Regional Freedom of Information Officer U.S. EPA, Region 4 AFC Bldg, 61 Forsyth Street., S.W., 9th Flr (4PM/IF) Atlanta, GA 30303-8960

You are hereby commanded to do each of the following acts at the instance of the Plaintiff Rosa Ann Menafee, within fifteen(15) days after service of this subpoena:

- 1. That you produce the and permit this Plaintiff to inspect and to copy each of the following documents:
 - All documents, records, inspections, communications with, or regarding, photographs, videos, check lists, compliance data, or other material related to asbestos at the Uniroyal Plant located in Opelika, AL.
 - Particular copies and copying may be discussed with the attorney at 256-237-9586.

Such production and inspection is to take place at the place where the documents or things requested are regularly kept or at some other reasonable place designated by you.

You are further advised that other parties to this action in which this subpoena has been issued have the right to be present at the time of such production or

inspection.

You have the option to deliver or mail legible copies of documents or things to the party causing the issuance of this subpoena, but you may condition such activity on your part upon the payment in advance by the party causing the issuance of this subpoena and stating, with respect to any item or category to which objection is made, your reasons for such objection.

DATED:		
CIRCUIT CLERK		
and / or		
DEPUTY CLERK		

PLEASE MAIL COPIES TO:

Thomas J. Knight HUBBARD & KNIGHT 1125 Noble Street Anniston, Alabama 36202